

EXHIBIT 1

John Coyle

From: John Coyle
Sent: Wednesday, February 9, 2022 4:25 PM
To: MRains@rlslawyers.com
Cc: John Coyle; MonterrosaSeanZ953188@mceldrewyoung.filevineapp.com
Subject: Courtesy copy of federal subpoena
Attachments: Subpoena_Vallejo_Police_Union.pdf

Attorney Rains:

I am aware that you have represented the Vallejo Police Officers Association in connection with investigations related to badge bending and destruction of property. Therefore, I wanted to provide you a courtesy copy of a subpoena served this week on the Vallejo Police Officer's Association.

Thank you for your attention to this matter. If you have any questions or concerns, please let me know.

John J. Coyle

Partner



**MCELDREW YOUNG
PURTELL MERRITT**

123 South Broad Street, Suite 2250, Philadelphia, PA 19109

Phone: 215-545-8800 ext. 103 | Fax: 215-545-8805

Email: jcoyle@mceldrewyoung.com

Website: mceldrewyoung.com

Uwfhynj Fwj fx

Catastrophic Injury & Wrongful Death / Civil Rights / Dangerous Drugs & Devices /
Medical Malpractice / Nursing Home Fraud, Neglect & Abuse / Railroad & FELA /
Trucking & Mass Transportation / Whistleblower & Complex Litigation

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EXHIBIT 2

Civil Action No. 2:20-cv-01563

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* Vallejo Police Officers Association
on *(date)* 6-27-2022.

☒ I served the subpoena by delivering a copy to the named person as follows: Christy Her, Deputy Clerk
111 Amador Street, Vallejo, CA 94590

on *(date)* 7-5-2022; or

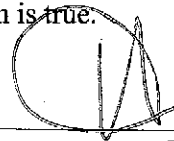
☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: 07/05/2022



Server's signature

Dennis Kittelson, RPS 130422 Solano County

Printed name and title

1017 Topsail Drive
Vallejo, CA 94591

Server's address

Additional information regarding attempted service, etc.:

UNITED STATES DISTRICT COURT

for the

Eastern District of California



Monterrosa, as Admin. of the Estate of Monterrosa

Plaintiff

v.

City of Vallejo, et al.

Defendant

)
)
)
)
)
)
)

Civil Action No. 2:20-cv-01563

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To:

Vallejo Police Officers Association, 1040 Colusa Street, Vallejo, CA 94590

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: All correspondence, emails, communications, messages, documents, interviews or reports relating in any way to Jarrett Tonn, John Whitney, and/or the practice of badge bending by union members.

Place: McEldrew Young Purtell Merritt
 123 South Broad Street, Suite 2250
 Philadelphia, PA 19109

Date and Time:

02/21/2022 12:02 am

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 2/1/2022

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Scan Monterrosa, who issues or requests this subpoena, are:

123 S. Broad St. Suite 2250 Phila., PA 19109; jcoyle@mceldrewyoung.com; p. 215-545-8800; c. 610-291-9514

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

EXHIBIT 3

JOHN COYLE, Esq.
McELDREW PURTELL
123 South Broad Street, Suite 2250
Philadelphia, PA 19109
(215) 545-8800

Attorney for Plaintiffs.

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

NEFTALI MONTERROSA, ET AL.,

Plaintiff,

vs.

CITY OF VALLEJO, ET AL.,

Defendant.

Case No: 2:20-cv-01563-DAD-DB

**PLAINTIFFS' NOTICE OF
MOTION AND MOTION TO
ENFORCE NONPARTY SUBPOENA
FOR PRODUCTION OF
DOCUMENTS**

Date: February 7, 2023

Time: 1:30 p.m.

Judge: Hon. Dale A. Drozd

PLEASE TAKE NOTE that on February 7, 2023, at 1:30 p.m. or as soon thereafter as the matter may be heard, before the Honorable Judge Dale A. Drozd, Plaintiffs will and hereby does move to enforce the subpoena served upon the Vallejo Police Officers Association.

Pursuant to Rule 251(e), because there "has been a complete and total failure to respond to a discovery request," the Plaintiffs bring this motion on fourteen days' notice without a joint statement regarding this discovery disagreement. Counsel for the parties met and conferred. No party opposes this request. The motion is based on this notice of motion, the accompanying memorandum of points and authorities, the entire record of the action, any oral argument as the Court may receive, and other matters that the Court deems just and proper.

1 DATED: 1/24/2023

2 Respectfully submitted,

3 /s/ John J. Coyle

4 JOHN J. COYLE

5 Attorney for Plaintiffs McELDREW

6 PURTELL

7 123 South Broad Street

8 Suite 2250

9 Philadelphia, PA 19109

10 (215) 545-8800

11 jcoyle@mceldrewpurtell.com

12 Carla M. Wirtschafter

13 Reed Smith LLP

14 1901 Avenue of the Stars

15 Suite 700

16 Los Angeles, CA 90067

17 310-734-5253

18 cwirtschafter@reedsmith.com

CERTIFICATE OF SERVICE

I, John J. Coyle, Esq., Counsel for Plaintiffs in this matter hereby certifies that a copy of the foregoing Notion of Motion and Motion to Enforce, as well as its attachments, including the Plaintiffs' Memorandum of Points and Authorities in Support of the Motion was sent via certified and electronic mail to Vallejo Police Officers Association at the address shown below:

Vallejo Police Officers Association
1040 Colusa Street
Vallejo, CA 94590

Michael L. Rains, Esq
MRains@rlslawyers.com

DATED: 1/24/2023

Respectfully submitted,

/s/ John J. Coyle
JOHN J. COYLE
Attorney for Plaintiffs
McELDREW PURTELL
123 South Broad Street
Suite 2250
Philadelphia, PA 19109
(215) 545-8800
jcoyle@mceldrewpurtell.com

Carla M. Wirtschafter
Reed Smith LLP
1901 Avenue of the Stars
Suite 700
Los Angeles, CA 90067
310-734-5253
cwirtschafter@reedsmith.com

JOHN COYLE, Esq.
McELDREW PURTELL
123 South Broad Street
Suite 2250
Philadelphia, PA 19109
(215) 545-8800

Attorney for Plaintiffs.

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

NEFTALI MONTERROSA, ET AL.,

Plaintiffs,

vs.

CITY OF VALLEJO, ET AL.,

Defendant.

Case No: 2:20-cv-01563-DAD-DB

**MEMORANDUM IN SUPPORT OF
THE PLAINTIFFS' MOTION TO
ENFORCE A NONPARTY
SUBPOENA FOR PRODUCTION OF
DOCUMENTS**

Date: February 7, 2023

Time: 1:30 p.m.

Judge: Hon. Dale A. Drozd

MEMORANDUM OF POINTS AND AUTHORITIES

The Plaintiffs served the Vallejo Police Officers Association (hereinafter "VPOA"), a non-party, with a subpoena for production of documents pursuant to Fed. R. Civ. P. 45. In response, the VPOA did not voice objections, ask for an extension of time or file a motion to quash. Instead, VPOA failed to produce any responsive documents or respond in any manner. This Court should compel the VPOA to respond to the subpoena.

Factual Background

This case arises from the officer-involved shooting death of Sean Monterrosa by Vallejo Police Officer Jarrett Tonn ("Officer Tonn") on June 2, 2020. Mr. Monterrosa was unarmed and kneeling on the ground when Officer Tonn, without warning, fired his silenced military style assault

1 rifle from the back seat of an unmarked Vallejo PD truck and through the windshield, striking Mr.
2 Monterrosa in the back of the head and killing him.

3 In the aftermath of the shooting, the City of Vallejo (“the City”) retained OCR group to
4 investigate the shooting. That investigation and subsequent review by Vallejo Police Chief Shawny
5 Williams determined that Officer Tonn’s use of force was unreasonable, and this led the City to seek
6 his termination. Through further investigations it was uncovered that there was a thriving culture of
7 excessive unreasonable violence among the Vallejo Police Department, and that the department had
8 a “siege mentality,” with allegations of a badge bending practice where Vallejo officers would bend
9 the points of their badge when they killed a citizen.

11 As a part of this investigation, the VPOA, in a letter written by their attorney, confirmed the
12 badge bending practices but attempted to frame the reason for the practice as a celebration by
13 officers of surviving a dangerous situation. Through more recent limited testimony in the Solano
14 County Superior Court, the transcript reflects that the badge bending report includes testimony from
15 former Vallejo Officer Tribble that he and Officer Gary Jones bent the badge of Jarrett Tonn.
16 VPOA has since remained evasive to further inquiry.

18 Plaintiffs filed their complaint against the named Defendants on August 6, 2020, followed by
19 Plaintiffs First Amended Complaint on December 22, 2020, and Plaintiffs Second Amended
20 Complaint on March 11, 2021.

22 On February 2, 2022, Plaintiffs noticed the City of Vallejo with nine subpoenas for production
23 of documents from individuals and entities associated with the City of Vallejo or the underlying
24 investigation of the incident, with one to the VPOA (hereinafter “the Subpoena”). The Subpoena
25 requests all correspondence, emails, communications, messages, documents, interviews or reports
26 relating in any way to Jarrett Tonn, John Whitney, and/or the practice of badge bending by union
27 members. Counsel for the City of Vallejo and Plaintiffs met and conferred by phone on February 2,
28 2022. The City of Vallejo did not object to the Subpoena to the Vallejo Police Officers’ Association

1 at that time, nor any time since then. The following week, on February 9, 2022, Counsel for Plaintiff,
2 John J. Coyle, Esq., emailed Michael L. Rains, Esq., who, based on information and belief is Counsel
3 for the VPOA, a courtesy copy of the Subpoena. *See* Exhibit 1. Mr. Rains never responded to this
4 email.

5
6 The VPOA was formally served with the Subpoena on July 5, 2022. *See* Exhibit 1. According
7 to the process server's affidavit, the subpoena was served personally on Christy Her, identified as
8 "Deputy Clerk." *Id.*

9 Despite being on notice of the Subpoena for at least six months, to date, the VPOA has not
10 produced a single responsive document, nor has Counsel for the VPOA raised any objections, nor
11 communicated in any way with Plaintiffs.

12 **Argument**

13
14 Federal Rule of Civil Procedure 45 governs the issuance of subpoenas. Under Rule
15 45(a)(1)(D) a party may issue a subpoena compelling a non-party to produce documents and tangible
16 things. Federal Rules of Civil Procedure 45 requires the subpoena's recipient to produce the requested
17 information and materials, and while they may object to all or part of a subpoena, the objection must
18 be adequately supported. Fed. R. Civ. P. 45(c)(2) and 45(e). The objection must be served before the
19 earlier of the time specified for compliance or 14 days after the subpoena is served. Fed. R. Civ. P.
20 45(d)(2)(B). Assuming that a subpoena is properly constituted and served, and no objections are
21 raised, Rule 45 requires the subpoena's recipient to produce the requested information and materials.

22
23 Even if the subpoena is objected to, this Court may compel production if the issuing party
24 shows (1) a substantial need for the material sought, (2) it cannot otherwise be obtained without undue
25 hardship, and (3) reasonable compensation is paid to the person addressed in the subpoena.

26 Fed. R. Civ. P. 45(d)(3)(C); *see U.S. v. CBS, Inc.*, 666 F.2d 364, 368-89 (9th Cir. 1987). However,
27 because the VPOA did not object, let alone object with adequate support in a timely manner, there is
28 no discernable justification for their refusal to comply.

1 Plaintiffs are entitled to requested materials and information because they are directly relevant
2 to the *Monell* claims at issue in this litigation. Further, the information is directly relevant to the
3 central issue of whether Officer Tonn or anyone else at the time of the shooting was in fact in fear of
4 immediate threat of death or bodily injury. Due to the nature of the information requested, there are
5 no other means for Plaintiffs to obtain them.
6

7 Here, the Court should issue an order compelling compliance with the subpoena. The VPOA
8 was served with a valid subpoena, and Counsel for the VPOA was put on notice of the Subpoena as
9 well. The VPOA has failed to respond entirely, much less serve objections or file a motion to quash.
10 That noncompliance has led all parties to incur unnecessary costs and deprived the Plaintiffs of
11 relevant evidence.
12

13 Conclusion

14 In light of the above, Plaintiffs respectfully ask this Court to grant their Motion to Enforce
15 the Subpoena to Vallejo Police Officers Association.
16

17 DATED: January 24, 2023

18 Respectfully submitted,

19 /s/ John J. Coyle
20 JOHN J. COYLE
21 Attorney for Plaintiffs
22 McELDREW PURTELL
23 123 South Broad Street
24 Suite 2250
Philadelphia, PA 19109
(215) 545-8800
jcoyle@mceldrewpurtell.com

25 Carla M. Wirtschafter
26 Reed Smith LLP
1901 Avenue of the Stars
Suite 700
27 Los Angeles, CA 90067
310-734-5253
28 cwirtschafter@reedsmith.com

EXHIBIT 4

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

NEFTALI MONTERROSA, et al.,

Plaintiffs,

v.

CITY OF VALLEJO, et al.,

Defendants.

No. 2:20-cv-1563 TLN DB

ORDER

On January 24, 2023, plaintiffs filed a motion to compel. (ECF No. 59.) On February 8, 2023, plaintiffs noticed the motion for hearing before the undersigned on March 10, 2023, pursuant to Local Rule 302(c)(1).¹ (ECF No. 61.) Plaintiffs' motion asserts that plaintiffs served non-party Vallejo Police Officers Association ("VPOA") with a subpoena for production of documents on July 5, 2022. (ECF No. 59 at 6.) "VPOA has not produced a single responsive document, nor has Counsel for the VPOA raised any objections, nor communicated in any way with Plaintiffs."² (Id.)

¹ The undersigned finds plaintiffs' motion suitable for resolution without a hearing pursuant to Local Rule 230(g).

² Plaintiff also noticed defendant City of Vallejo with one of the subpoena's to VPOA, and "[t]he City of Vallejo did not object" to the subpoena. (ECF No. 59 at 5.)

“A Rule 45 subpoena is the only discovery method by which information may be obtained directly from a nonparty.” F. Subpoena, RUTTER GROUP PRAC. GUIDE FED. CIV. PRO. BEFORE TRIAL, Ch. 11(IV)-F. A copy of plaintiffs’ motion was served on the VPOA and the defendants. (ECF No. 59.) Pursuant to Local Rule 251(e) any response to plaintiffs’ motion was to be filed on or before March 3, 2023. No response to the motion was filed. After reviewing plaintiffs’ briefing, and given the total failure to respond, the undersigned finds good cause to grant plaintiffs’ motion.

Accordingly, IT IS HEREBY ORDERED that:

1. Plaintiffs’ unopposed January 24, 2023 motion to compel (ECF No. 59) is granted;
2. The March 10, 2023 hearing of plaintiffs’ motion is vacated; and
3. Within seven days of the date of this order VPOA shall provide the responsive discovery without objection.

DATED: March 7, 2023

/s/ DEBORAH BARNES
UNITED STATES MAGISTRATE JUDGE

DLB:6
DB/orders/orders.civil/monterrosa1563 mtc.grnt.ord

EXHIBIT 5

From: [Michael Rains](#)
To: [Amanda Jonas Lorentson](#)
Cc: [John Coyle](#); [Sharon Abrahamson](#)
Subject: RE: VPOA Subpoena
Date: Wednesday, March 8, 2023 7:48:46 PM
Attachments: [image016.png](#)
[image007.png](#)
[image009.png](#)
[image011.png](#)
[image013.png](#)
[image015.png](#)

Amanda: Following up on my earlier email, I have talked to Michael Nichelini, who is the President of the Vallejo Police Officer's Association. He plans to call you tomorrow to discuss this matter further, and shed some light, I think, on the issue of whether the VPOA was ever "served" with a Subpoena to produce records. As to the email from John Coyle dated February 9, 2022 addressed to me, to the best of my memory, I believe when I saw the email, even though I did not represent the VPOA in connection with this litigation, and only represented individual officers who were being interviewed about "badge bending," I contacted the secretary to the Police Association to see if they had been served recently with a Subpoena for records or documents related to the Monterrosa case (since the proof of service attached to my "courtesy copy" did not reflect actual service on the VPOA), and was advised they had not been served with such a subpoena. I assume that is why a further attempt to serve the VPOA occurred in July, 2022. Lt. Nichelini was going to check on some other issues before calling you tomorrow to discuss this matter.

Michael L. Rains
Attorney at Law
RAINS LUCIA STERN
ST PHALLE & SILVER, PC
Phone 925.609.1699
Fax 925.609.1690
www.RLSlawyers.com

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privileges applicable to this email and any attachments are expressly reserved.

From: Amanda Jonas Lorentson <alorentson@mcel drewpurtell.com>

Sent: Wednesday, March 8, 2023 6:33 AM

To: Michael Rains <mrains@rlslawyers.com>

Cc: John Coyle <jcoyle@mcel drewpurtell.com>

Subject: VPOA Subpoena

Importance: High

Mr. Rains,

I am sending you a copy of a recent order that was entered against the Vallejo Police Officers' Association, compelling production of documents sought through a subpoena that was issued last year. I am bringing this to your attention since you have represented the VPOA in recent matters including the badge bending investigation. However, if you are not the correct point of contact, please kindly direct me to that person and I will follow up with them instead.

Thank you and have a great day,

Amanda

Amanda Jonas Lorentson, Esq.

Trial Lawyer

McEldrew Purtell

✉ alorentson@mcel drewpurtell.com

📞 [215.545.8800](tel:215.545.8800)

📱 [716.868.5053](tel:716.868.5053)

📅 [215.545.8805](tel:215.545.8805)

📍 [123 S. Broad St., Ste. 2250, Philadelphia, PA 19109](#)

mcel drewpurtell.com



MCELDREW PURTELL

Attorneys Licensed in PA, NJ, NY, DC, TX

Practice Areas – Catastrophic Injury & Wrongful Death:

Birth Injury / Brain Injury / Nursing Home Abuse, Neglect & Fraud / Trucking, Commercial Vehicle & Ride Share / Excessive Force, Police Shootings & In-Custody Deaths / Premises Liability, Negligent Security & Dram Shop / Products Liability / Railroad & FELA / Medical Malpractice

CONFIDENTIALITY NOTICE: The information contained in this email is privileged and confidential information intended for the use of the addressee or agent responsible for delivering this message to the intended recipient. You are hereby

EXHIBIT 6

From: [Vallejo POA](#)
To: [Amanda Jonas Lorentson](#); [John Coyle](#)
Subject: Improper/Incomplete Service
Date: Tuesday, March 28, 2023 9:07:43 PM

Ms. Lorentson:

I left you a message on March 9, 2023, at around 9:30 AM. To date, my call has not been returned.

I am in receipt of two letters from you. One dated, February 8, 2023, and one dated March 8, 2023. These are the only two communications the VPOA has received regarding this matter.

First and foremost, the VPOA has not been served with a valid subpoena - or any subpoena for that matter. The proof of service you included in your correspondence clearly indicates that service was made to someone I have never heard of (Christy Her) and to the Police Department at 111 Amador St. We are NOT the same entity as the Police Department. We do NOT have an office at 111 Amador St. We do NOT conduct business out of 111 Amador St. And, as you appear to know based on the two letters we received from you, our office is located at 1040 Colusa St. Further, the process server, Kittleson, has likely been to our office, knows that we are a separate entity and did you a disservice by delivering the notice to the incorrect location/person.

Additionally, halving our name trashed in the media for “failing to respond to a subpoena” (that likely was from false information provided by your office) is damaging to our name and relationships within the City and community. Your office never called, never emailed and sent correspondence to the wrong place. Our contact is easily available with a simple google search. Your office either purposely sought to create more drama around this case or were simply deficient in your efforts to contact us and act in good faith.

Finally, you seem to lean on the fact that you contacted Michael Rains as “our attorney.” Mr. Rains is “an” attorney (and a very good one) but he is not the “attorney of record” for THE VPOA. We use several attorneys from different law firms depending on the type of issue we are having. For you to assume Mr. Rains represents the VPOA singularly and as a whole, is not accurate. Additionally, your insistence on contacting him has incurred us legal expenses for his time in responding to you. I have advised him not to do so anymore on behalf of the VPOA if contacted by your office in the future.

So where does this leave us? If you plan to continue looking for records from the VPOA, I suggest you serve a proper subpoena. If this had been handled correctly from the beginning, I could have simply told you we do not have any responsive records. Unfortunately, your office has made this adversarial - either by design or by of due diligence.

Cordially,

Michael Nichelini
President
Vallejo Police Officers' Association
(707) 644-3913 - vallejopoa.org

Vice President
Vallejo Police Activities League

EXHIBIT 7

Civil Action No. 2:20-cv-01563

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* Vallejo Police Officers' Association, Attn: Michael Nichelini on *(date)* Jun 6, 2023, 9:40 am.

☒ I served the subpoena by delivering a copy to the named individual as follows: Personally accepted by Michael Nichelini at his residence. Mr. Nichelini stated his name and matched the photo provided on (date) Tue, Jul 18 2023; or

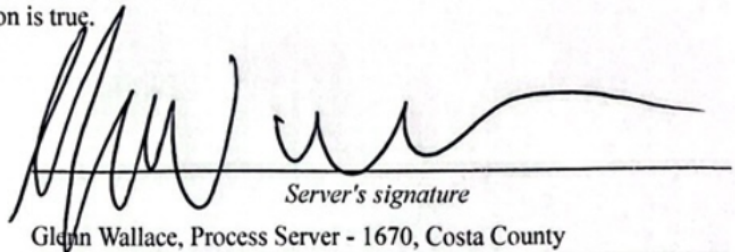
☐ I returned the subpoena unexecuted because: _____.

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of \$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ \$0.00.

I declare under penalty of perjury that this information is true.

Date: 7/19/23



Server's signature
Glenn Wallace, Process Server - 1670, Costa County

Printed name and title

3616 Emerson St Apt 5 Oakland, CA 94610

Server's address

Additional information regarding attempted service, etc.:

Successful Attempt: Jul 18, 2023, 8:15 pm CDT at 1400 Technology Ln, Apt. 1412, Petaluma, CA 94954 received by Vallejo Police Officers' Association, Attn: Michael Nichelini.

Personally accepted by Michael Nichelini at his residence. Mr. Nichelini stated his name and matched the photo provided